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October 4, 2012

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Head Start Telecom, Inc. dba dartphone Compliance Plan; Notice of Ex Parte Meeting; WC Docket Nos. 09-197, 11-42

Dear Ms. Dortch:

On Tuesday, October 2, 2012, Scott Cathey and Tim Riley of Head Start Telecom, Inc. dba dartphone ("Head Start Telecom"), and John Heitmann and Joshua Guyan of Kelley Drye & Warren, LLP, met with Divya Shenoy, Michelle Schaefer, Alexander Minard and David Bradford of the Wireline Competition Bureau ("Bureau") to discuss Head Start Telecom's Compliance Plan filed on June 27, 2012 in the above referenced dockets.

At the meeting, Head Start Telecom provided the Bureau staff with the enclosed presentation introducing the company and its management, the company's Lifeline product offerings and its approach to compliance with the requirements of the *Lifeline Reform Order*.¹ Head Start Telecom will be submitting a revised Compliance Plan shortly.

¹

See Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (Feb. 6, 2012).

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This letter and presentation are being filed electronically for inclusion in the public record of the above-referenced proceedings. Please feel free to contact the undersigned with any questions.

Respectfully submitted,



John J. Heitmann
Joshua T. Guyan

Counsel to Head Start Telecom, Inc.

cc: Divya Shenoy
Michelle Schaefer
Alexander Minard
David Bradford

Head Start Telecom, Inc. FCC Compliance Plan Meeting



October 2, 2012

Agenda

- Introduction of Company
- Company Lifeline Product Offerings
- Marketing/ Advertising Compliance
- End User Enrollment
- Annual Certification
- Procedures Addressing Waste, Fraud and Abuse
- Questions

Head Start Telecom, Inc. d/b/a dartphone

- Head Start Telecom, Inc. d/b/a dartphone is financially and technically capable of providing the supported Lifeline service
 - Head Start Telecom was designated as an ETC in Oklahoma for wireline in 2008 and for wireless in 2011
 - www.dartphone.com

Key Management: (bios on next slide)

- Scott Cathey, President
- Tim Riley, COO

Key Management

- Scott Cathey, President –
 - Received Bachelor of Science Degree in Business Administration/Finance at Oklahoma State University
 - Over 15 years of executive management experience in diverse markets; positions held range from Personnel Director, COO, CFO, Vice President of Business Development and President for four separate companies
 - Efforts focus on providing vision, leadership and a strategic marketing direction for the corporation, and implementing plans, programs and processes designed to meet corporative objectives

Key Management

- Tim Riley, COO –
 - Mr. Riley received his M.S. in Telecommunications Management and a B.S. in Communications from Oklahoma State University
 - More than 16 years of telecommunications experience, specifically in prepaid and postpaid wireline, wireless and broadband Internet access
 - Senior level management of operations, sales, customer care, human resources, network deployment and marketing campaigns
 - Served as Vice President of Administration and Operations for regional wireless start-up; Director of Operations for Chickasaw Wireless; Director of Business Development for Sure-Tel, Inc.; Communications Manager for OKFive, LLC; and various positions with Southwest PCS, Inc.
 - Began career as Assistant Director for A.C.C.E.S.S., a non profit company focused on bringing technology resources to rural underserved areas in Oklahoma

Head Start Telecom Lifeline Product Offerings

- Current Lifeline Product Offerings:
 - Unlimited Voice minutes – Oklahoma
 - 1000 voice or 2000 texts - Oklahoma
 - 250 free minutes – all states outside of Oklahoma
- All plans include:
 - Free handset
 - Free calls to 911 emergency services
 - Free calls to customer service and balance inquiries
 - Free voicemail, caller ID, and call waiting
 - Free domestic long distance calling

Head Start Telecom Oklahoma Lifeline Product Offerings

Plan Description	Monthly Minutes	Monthly Minutes
Price to Lifeline Subscriber	\$4.58 (OK)	\$1.00 (OK)
Number of Minutes	Unlimited Voice	1000
Rollover	N	N
Text Messaging	N/A	2:1

All plans include. . .

- Call waiting
- Caller ID
- Voice mail

Head Start Telecom Outside of Oklahoma Lifeline Product Offerings

Plan Description	Monthly Minutes
Price to Lifeline Subscriber	FREE (outside OK)
Number of Free Minutes	250
Rollover	N
Text Messaging	1:1

All plans include. . .

- Call waiting
- Caller ID
- Voice mail

Head Start Telecom Oklahoma

Wireline Lifeline Product Offerings

Plan Description	Monthly Minutes
Price to Lifeline Subscriber	\$1.00
Number of Free Minutes	Unlimited local calling
Rollover	N/A

All plans include. . .

- Call waiting
- Caller ID
- Voice mail

Head Start Telecom Lifeline Product Offerings

- Public Safety and 911/ E911 Access:
 - Head Start Telecom will ensure that all handsets used in connection with its Lifeline service are E911- compliant
 - Head Start Telecom will provide its Lifeline customers with access to 911 and E911 services:
 - Through its underlying carriers Sprint and Verizon
 - At the time of Lifeline service initiation
 - Regardless of activation status and minute availability

Marketing & Advertising Compliance

- In compliance with the marketing and disclosure requirements, all of Head Start Telecom's marketing materials will:
 - Disclose the ETC name
 - Explain in clear, easily understood language the following:
 - The service is a Lifeline service and is non-transferable
 - Lifeline is a government assistance program
 - Only eligible consumers may enroll in the program
 - What documentation is necessary for enrollment
 - The program is limited to one benefit per household, consisting of either wireline or wireless service
- Head Start Telecom's application form will state that Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program

Marketing & Advertising Compliance

- Direct Sales – Electronic: Typically a face-to-face enrollment transaction occurring in retail store or at an event; all documentation can be witnessed in real-time and end user walks away with a phone
- Direct Sales – Paper: Face-to-face enrollment in which enroller does not have access to real-time electronic validation; as such, the phone must be shipped to the customer after the Quality Assurance department performs validation
- Internet Sales: Self-driven enrollment by end user who signs self-certification form electronically to complete transaction; proof of identity and program eligibility must be mailed/faxed, delaying shipment of phone
- Phone Sales: Real-time, but proof of identity, program eligibility and completed self-certification form must be mailed/faxed, delaying shipment of phone

End User Enrollment

- Head Start Telecom's enrollment process requires confirmation of the following items:
 1. Confirms applicant is not currently receiving a subsidy from another carrier
 - Applicant Certifies under penalty of perjury
 - Specifically mentions other providers in certification
 - Company performs duplicate check into an internal database
 2. Confirms applicant's identity (see government issued picture ID)
 3. Confirms program or income eligibility (see proof of participation or annual household income)
 4. Confirms valid residential address and whether the address is permanent/ temporary or multi-household (validates address via Melissa data)
 5. Confirms applicant receives handset and personally activates the phone (by placing a call) prior to seeking reimbursement from Universal Service Fund

Annual Recertification

- Head Start Telecom will recertify the eligibility of all of its Lifeline customers as of June 1, 2012, to be concluded by the end of the year, and the results sent to USAC by January 31, 2013
- Head Start Telecom will continue to re-certify each Lifeline end user annually
- All customers who fail to respond to recertification attempts within 30 days will be given a written notice that they have 30 days to confirm their eligibility or be de-enrolled from the Lifeline program
- Additionally, Head Start Telecom will follow any state-specific recertification requirements

Procedures Addressing Waste, Fraud and Abuse

- Head Start Telecom complies in all policies and procedures surrounding its Lifeline program
 - Marketing/ advertising
 - End user initial enrollment & annual certification
 - Training of employees
 - Customer non-usage & de-enrollment
- Subscriber Usage
 - 60 day non-usage policy

QUESTIONS?

Thank You